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March 31, 2022

Honorable Louis L. Stanton
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: Biberman v. Kantor, et al., 21 Civ. 4862 (LLS)

Dear Judge Stanton:

Counsel for plaintiff and defendant respectfully submit this joint request for an adjournment of the initial conference for this matter which is presently scheduled for April 8, 2022. This is the parties' first request for such adjournment.

The reason for this request is two-fold.

First, counsel for the defendant, Richard Freiman has advised me that he will be out of state and not available to attend the conference on that date.

Second, the parties are in the process of amending the caption and complaint to substitute Brett Robinson who has been identified by defendant as the President of the Board of Managers of the 125 Maiden Lane Condominium during the relevant time period, in place of the "John Doe" defendant and defendant Robert Kantor who defendant reports had been succeeded as President of the Board of Managers. Counsel for plaintiff and defendant Condominium are acting cooperatively to stipulate to the amendment of the caption and to the service and filing of the amended complaint and answer to be completed within thirty days hereof. Accordingly, we request that the initial conference be adjourned to a date on or after May 5. (Plaintiff's counsel would request also that the conference be scheduled for a date other than May 17 – May 23, during which time he will be travelling.)

We thank Your Honor for your courtesy.

Respectfully,

/s/ Stanley K. Shapiro
Stanley K. Shapiro

cc: Richard M. Freiman, Esq. (rfreiman@freimanassociates.com)

Adjourned to
Friday May 6
2022 at
12:30 PM
Louis L. Stanton
4/4/22